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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA **3:22-cr-00107-SI**

v.

**GOVERNMENT'S SENTENCING
MEMORANDUM**

HEATHER MARTH,

Defendant.

On December 31, 2022, Tualatin Police arrested Heather Marth in flight from a fraud-in-progress. On foot at the time of her arrest, Defendant flew to Oregon from Florida to participate in a scheme engineered by coconspirators (indicted in the companion case, 3:22-cr-00187-MO) to defraud banks in Oregon, Washington, and Idaho. Defendant has pleaded guilty to an offense covering that conduct. The PSR appropriately calculates the guideline range. The government recommends a low-end sentence of 10 months and five years of supervised release.

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I. DEFENDANT'S BACKGROUND AND OFFENSE CONDUCT

Defendant is 43 years old. PSR ¶ 74. Upon review of Defendant's history, it would be an understatement to say that she had a difficult childhood, and that Defendant lacked stability in her adult life. See PSR ¶¶ 75–84.

Most troublesome is Defendant's long history of hard drug abuse, starting with cocaine at age 17. PSR ¶¶ 94–95. Defendant moved on to heroin, fentanyl (a drug which claimed the life of her second husband) and methamphetamine, testing fate with multiple overdoses. PSR ¶¶ 82, 95–98. Nevertheless, Defendant has much to celebrate. She has three children with her first husband, who range from 14 to 23. PSR ¶ 80. She hopes to return to Maryland to live a normal life with her children. PSR ¶ 84.

Defendant has no connection to the State of Oregon, but defendant chose to travel to this state to voluntarily participate in a fraud scheme targeting its banks. The general scheme was straightforward. Defendant's coconspirators broke into vehicles in Oregon and elsewhere, in locations where women were likely to leave purses in their cars. PSR ¶ 14. Defendant's coconspirators stole checkbooks and driver's licenses from the car prowл victims. PSR ¶ 14. Defendant used the stolen identifications to impersonate a victim to fraudulently withdraw funds from a bank, oftentimes, using the drive-through lane of a bank. *See* PSR ¶ 27. To do so, Defendant would present a victim's stolen identification along with a stolen check fraudulently written by another victim. *See* PSR ¶ 33. Defendant repeated this scheme until her apprehension by law enforcement.

On March 16, 2022, defendant was indicted on five counts relating to her participation in the fraud scheme. On November 8, 2022, defendant pleaded guilty to a superseding information charging her with a single count of conspiracy to commit bank fraud.

II. **RESTITUTION**

The restitution in this case as identified in the PSR totals \$110,713. PSR ¶ 114. This amount represents only the actual losses to the banks that were victimized in the fraud scheme. The government has provided an updated restitution amount based on the additional amount owed to the victims of the car prowls (whose identifications and checkbooks were used to commit the fraud scheme) and losses related to lodgings rented in furtherance of the conspiracy. Is detailed in the below table, that amount totals \$120,137. The names of the car prowл victims (and the contact information for all victims) will be provided to the Court separately.

Victim Name	Victim Amount
Columbia Bank	\$6,975
Solitary Credit Union	\$17,615
Idaho Central Credit Union	\$62,770
O Bee Credit Union	\$3,865
TwinStar Credit Union	\$19,488
Victim 1	\$1,725
Victim 2	\$481
Victim 3	\$500
Victim 4	\$840
Victim 5	\$1,400
Victim 6	\$750
Victim 7	\$1000
Victim 8	\$595
iTrip Vacations	\$2,133

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III. CONCLUSION

For the foregoing reasons, the government recommends a sentence of 10 months' imprisonment, a five-year term of supervised release, and a \$100 special assessment.

Dated: January 25, 2023

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Siddharth Dadhich
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Assistant United States Attorney